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April 1, 2022

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001, 03-md-1570 (GBD) (SN)*

Dear Judge Netburn:

As directed by the Court’s order by memorandum endorsement of January 31, 2022, ECF No. 7638, I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) to bring the Court up to date on the status of the parties’ efforts to propose redactions in accordance with the Court’s November 24, 2020 order, ECF No. 6541. The Plaintiffs’ Executive Committees (“Plaintiffs”), the Federal Bureau of Investigation (“FBI”), and Defendant Dallah Avco all join in this letter.

On March 16, 2022, Saudi Arabia circulated to the parties proposed redactions for the sealed filings leading up to the Court’s June 18, 2021 order. On March 29, 2022, Saudi Arabia circulated its position on certain sealed filings leading up to the Court’s August 12, 2021 order and to the November 1 and 2, 2021 evidentiary hearing, including filings that Saudi Arabia believes are now appropriate for filing on the public docket either without redactions, or with redactions based on the Court’s November 3, 2021 order. Saudi Arabia will continue to circulate proposed redactions to outstanding sealed filings as appropriate.

Plaintiffs have reviewed the redactions that Saudi Arabia circulated on March 16 and March 29, 2022, and either agree with or take no position on many of them. Kreindler & Kreindler LLP has indicated that it wishes to further discuss certain proposed redactions. Plaintiffs and Saudi Arabia have agreed that those discussions can take place in the coming week.

As noted in the parties’ last status report, to the extent any information in the parties’ sealed filings implicates records produced by the FBI pursuant to the FBI Protective Order, the FBI understands that the parties will provide the FBI with proposed redacted versions of those filings that reflect the redactions set forth in documents publicly released pursuant to section 2(b) of Executive Order 14040.

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Dallah Avco is continuing to review the redactions proposed by the parties.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before May 6, 2022.

Respectfully submitted,

/s/ *Michael K. Kellogg*

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)